

May 4, 2020

**By ECF**

The Honorable Lewis J. Liman  
United States District Judge  
United States Courthouse  
500 Pearl Street  
New York, New York 10007

**Re.: *Foster v. Construction and Realty Services Group, Inc., et al.***  
**1:19-cv-3020 (LJL)**

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Dear Judge Liman:

Please allow this letter to serve as an update on the status of the above-referenced action.

Regarding the pending settlement in this matter, the parties have encountered obstacles caused by the shutdown of all nonessential construction in New York, which has in turn shut down Defendants' business. We remain committed to finalizing a global settlement as previously discussed in Mr. Solotaroff's last letter to the Court. In case the global settlement does not come to fruition due to the aforementioned obstacles, however, we have also reached out to Mr. Solotaroff to obtain his settlement demand for this case individually.

To allow the parties to continue to pursue finalization of settlement without expending significant resources toward discovery, and given the difficulty in taking depositions during the office shutdowns caused by the pandemic, the parties respectfully request a 30-day extension of the discovery deadline in this action.

We will continue to keep the Court apprised of settlement developments, and we appreciate the Court's patience during these complicated times.

We thank the Court for its consideration.

Respectfully submitted,



Lisa Skruck

cc: Jason Solotaroff, Esq., via ECF